

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA ) CRIMINAL NO. 04-10114-DPW  
v. )  
1. ANTONIO CARDONA, ) VIOLATIONS:  
a/k/a "ANT," and ) 21 U.S.C. § 846 -- Conspiracy  
 ) to Distribute Cocaine Base  
2. JEROME LASSITER, ) 21 U.S.C. § 841(a)(1) --  
a/k/a "BUTTA," ) Distribution of Cocaine  
 ) Base  
Defendants. ) 18 U.S.C. § 2 --  
 ) Aiding and Abetting  
 ) 21 U.S.C. § 860(a) - Playground  
 ) Zone Violation  
 ) 21 U.S.C. § 861(a) - Use of a  
 ) Juvenile

SUPERSEDING INDICTMENT

COUNT ONE: (21 U.S.C. § 846 -- Conspiracy to Distribute  
Cocaine Base; 21 U.S.C. § 860(a) -- Playground  
Zone Violation)

The Grand Jury charges that:

On or about June 19, 2003, in the District of Massachusetts,

1. ANTONIO CARDONA, a/k/a "ANT," and
2. JEROME LASSITER, a/k/a "BUTTA,"

defendants herein, did knowingly and intentionally combine,  
conspire, confederate and agree with each other to possess with  
intent to distribute, and to distribute, a quantity of cocaine  
base, also known as "crack," a Schedule II controlled substance,  
within 1,000 feet of the real property comprising the Little  
Scobie Playground, in violation of Title 21, United States Code,

Sections 841(a)(1), 841(b)(1)(C) and 860(a).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation; 18 U.S.C. § 2 -- Aiding and Abetting)

The Grand Jury further charges that:

On or about June 19, 2003, at Boston, in the District of Massachusetts,

1. ANTONIO CARDONA, a/k/a "ANT," and
2. JEROME LASSITER, a/k/a "BUTTA,"

defendants herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 860(a), and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation)

The Grand Jury further charges that:

On or about July 1, 2003, at Boston, in the District of Massachusetts,

1. **JEROME LASSITER, a/k/a "BUTTA,"** defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 860(a).

COUNT FOUR: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation; 21 U.S.C. § 861(a) -- Use of a Juvenile)

The Grand Jury further charges that:

On or about July 23, 2003, at Boston, in the District of Massachusetts,

1. ANTONIO CARDONA, a/k/a "ANT,"

defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground and, in so doing, defendant, being a person at least eighteen years of age, did knowingly and intentionally employ, hire, use, persuade, induce and entice a person, who was then under eighteen years of age, to violate Title 21, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 860(a) and 861(a).

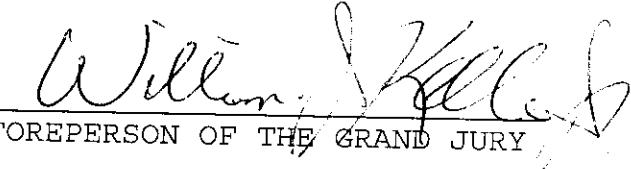
**Notice Of Additional Factors**

The Grand Jury further charges that:

1. Defendant Antonio Cardona, a/k/a "Ant," is responsible for at least 1, but less than 2, grams of cocaine base, also known as "crack" cocaine. Accordingly, U.S.S.G. § 2D1.1(c) (11) applies to this defendant.

2. Defendant Jerome Lassiter, a/k/a "Butta," is responsible for at least 2, but less than 3, grams of cocaine base, also known as "crack" cocaine. Accordingly, U.S.S.G. § 2D1.1(c) (10) applies to this defendant.

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

  
\_\_\_\_\_  
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS: October 28, 2004

Returned into the District Court by the Grand Jurors and  
filed.

\_\_\_\_\_  
DEPUTY CLERK

Criminal Case Cover SheetU.S. District Court - District of MassachusettsPlace of Offense: Category No. II Investigating Agency DEACity Boston**Related Case Information:**County SuffolkSuperseding Ind./ Inf. X Case No. 04-10114-DPWSame Defendant X New Defendant \_\_\_\_\_

Magistrate Judge Case Number \_\_\_\_\_

Search Warrant Case Number \_\_\_\_\_

R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**Defendant Name Antonio Cardona Juvenile:  Yes  NoAlias Name AntAddress 93 River Street, Mattapan, MABirthdate: 1983 SS # -0384 Sex: Male Race Hispanic Nationalit USDefense Counsel if known: Edward P. Ryan, Jr. Address 61 AcademyBar Number \_\_\_\_\_ Fitchburg, MA 01420**U.S. Attorney Information:**AUSA Patrick M. Hamilton Bar Number if applicable \_\_\_\_\_Interpreter: Yes  No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: Yes  NoWarrant Requested  Regular Process  In Custody**Location Status:**Arrest Date April 15, 2004X Already in Federal Custody as of 4/15/04 in PlymouthAlready in State Custody Serving Sentence  Awaiting Trial On Pretrial Release: Ordered by: \_\_\_\_\_ on \_\_\_\_\_Charging Document: Complaint  Information  IndictmentTotal # of Counts:  Petty  Misdemeanor  Felony 3

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: October 28, 2004 Signature of AUSA Patrick M. Hamilton

Signature of AUSA

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Antonio Cardona**U.S.C. Citations**

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21 U.S.C. §§ 846</u> and 860(a)	<u>Conspiracy to distribute cocaine base in a</u> <u>playground zone</u>	<u>1</u>
Set 2	<u>21 U.S.C. § 841(a)(1)</u> and 860(a)	<u>Distribution of cocaine base in a playground zone</u>	<u>2 and 4</u>
Set 3	<u>18 U.S.C. § 2</u>	<u>Aiding and abetting</u>	<u>2</u>
Set 4	<u>21 U.S.C. § 861(a)</u>	<u>Use of a juvenile in a drug offense</u>	<u>4</u>
Set 5			
Set 6			
Set 7			
Set 8			
Set 9			
Set 10			
Set 11			
Set 12			
Set 13			
Set 14			
Set 15			

**ADDITIONAL INFORMATION:** \_\_\_\_\_

Criminal Case Cover SheetU.S. District Court - District of MassachusettsPlace of Offense: Category No. II Investigating Agency DEACity Boston**Related Case Information:**County SuffolkSuperseding Ind./ Inf. X Case No. 04-10114-DPWSame Defendant X New Defendant \_\_\_\_\_

Magistrate Judge Case Number \_\_\_\_\_

Search Warrant Case Number \_\_\_\_\_

R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**Defendant Name Jerome Lassiter Juvenile:  Yes  NoAlias Name ButtaAddress 53 Ashton Street, #1, Dorchester, MABirthdate: 1984 SS # 0739 Sex: Male Race African-American Nationalit USDefense Counsel if known: John H. Cunha, Jr. Address One State StreetBar Number \_\_\_\_\_ Boston, MA 02109**U.S. Attorney Information:**AUSA Patrick M. Hamilton Bar Number if applicable \_\_\_\_\_Interpreter: Yes  No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: Yes  NoWarrant Requested  Regular Process  In Custody**Location Status:**Arrest Date 4/15/04X Already in Federal Custody as of 4/15/04 in PlymouthAlready in State Custody Serving Sentence  Awaiting Trial On Pretrial Release: Ordered by: \_\_\_\_\_ on \_\_\_\_\_Charging Document: Complaint  Information  IndictmentTotal # of Counts:  Petty  Misdemeanor  Felony 3

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: October 28, 2004 Signature of AUSA:   
Patrick M. Hamilton

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Jerome Lassiter**U.S.C. Citations****Index Key/Code****Description of Offense Charged****Count Numbers**Set 1 21 U.S.C. §§ 846Conspiracy to distribute cocaine base in a  
playground zone1Set 2 21 U.S.C. § 841(a)(1)Distribution of cocaine base in a playground zone2 and 3

and 860(a)

Set 3 18 U.S.C. § 2Aiding and abetting2

Set 4 \_\_\_\_\_

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Set 5 \_\_\_\_\_

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Set 15 \_\_\_\_\_

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**ADDITIONAL INFORMATION:** \_\_\_\_\_\_\_\_\_\_  
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